

1 Hon. Christopher M. Alston
2 Chapter 7
3 Hearing Date: June 18, 2021
4 Hearing Time: 9:30 a.m.
5 Hearing Site: Telephonic
6 Response Date: June 11, 2021

7
8
9
10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 IN RE:

14 SAMIA EL-MOSLIMANY,

15 Debtor.

16 Chapter 7

17 No. 18-14820-CMA

18
19 DECLARATION OF ANTHONY S. WISEN
20 IN SUPPORT OF CREDITOR HAYAT
21 SINDI'S OBJECTION TO TRUSTEE'S
22 MOTION TO APPROVE COMPROMISE
23 AND SETTLEMENT OF ADVERSARY
24 PROCEEDING 19-2-0116 CAPTIONED AS
25 BROWN V. AL-YOUSEF

26 I, Anthony S. Wisen, declare as follows:

27
28 1. I am an attorney with the Law Offices of Anthony S. Wisen, PLLC, counsel to
29 plaintiff Hayat Sindi (“**Plaintiff**” or “**Dr. Sindi**”). My WSBA number is 39656. I am
30 competent to make this Declaration. I have personal knowledge of, or have confirmed through
31 my review of court filings and publicly recorded documents, the facts stated in this Declaration
32 and know them to be true and correct.

33
34 DECLARATION OF ANTHONY S. WISEN - 1

35
36 Law Offices of Anthony S.
37 Wisen, PLLC
38 2208 NW Market St., # 502
39 Seattle, WA 98107
40 206.418-8720 · tony@wisenlaw.com

1 2. Plaintiff brought suit against Samia El-Moslimany (“Defendant”) and Ann El-
2 Moslimany on January 25, 2013 in Massachusetts State Court.

3 3. A true and correct copy of the First Circuit’s opinion in the matter *Hayat Sindi*
4 *v. Samia El-Moslimany and Ann El-Moslimany*, 896 F.3d 1 (2018) (the “First Circuit
5 Opinion”) is attached as Exhibit A hereto.

6 4. On February 27, 2017, Dr. Sindi recorded a Notice of Judgment Lien Against
7 Homestead Property and an official copy of the Amended Final Judgment in the King County
8 Real Property Records under Assessor’s Number 20170227001230. A true and correct copy of
9 the recorded document is attached as Exhibit B hereto.

10 5. A true and correct copy of the Second Amended Final Judgment entered on
11 August 17, 2018 in the district court is attached as Exhibit C hereto.

12 6. Dr. Sindi registered the Second Amended Final Judgment in King County
13 Superior Court under Case No. 18-2-22410-1 KNT, and on September 25, 2018, recorded the
14 resulting Foreign Judgment in the King County Real Property Records under Assessor’s
15 Number 20180925000965. A true and correct copy of the recorded document is attached as
16 Exhibit D hereto.

17 7. Attached as Exhibit E hereto is a true and correct copy of the Declaration of Rik
18 Jones, filed on April 9, 2021 in Case No. 18-4820-CMA at Dkt. No. 150.

19 8. Attached as Exhibit F hereto is a true and correct copy of the Notice of Hearing
20 on Trustee’s Motion to: 1) Approve Compromise and Settlement; 2) Authorizing Listing of
21 Property for Sale; 3) to Employ Realtor; or Alternatively, 4) to Compel Turnover of Property
22 of the Estate, filed on April 9, 2021 in Case No. 18-4820-CMA at Dkt. No. 148.

23
24
25
26
27 DECLARATION OF ANTHONY S. WISEN - 2

Law Offices of Anthony S.
Wisen, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisenlaw.com

1 9. Attached as Exhibit G hereto is a true and correct copy of the Agreement to
2 Market Property, effective April 30th, 2021.

3 10. Attached as Exhibit H hereto is a true and correct copy of a screenshot with
4 respect to the property at 2655 SW 151st Pl., Burien, WA, that I obtained from Zillow.com on
5 June 9, 2021.

6 11. Attached as Exhibit I hereto is a true and correct copy of a information with
7 respect to the property at 2655 SW 151st Pl., Burien, WA, that I obtained from Redfin.com on
8 June 9, 2021.

9
10 I declare under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct to the best of my knowledge and belief.

12 DATED this 11th day of June, 2021.

13
14 Law Offices of Anthony S. Wisen, PLLC
15 Attorneys for Hayat Sindi

16 By /s/ Anthony S. Wisen
17 Anthony S. Wisen, WSBA #39656
18 1752 NW Market St., #709
19 Seattle, WA 98107
20 Tel: (206) 418-8720
21 Email: tony@wisenlaw.com

22
23
24
25
26
27 DECLARATION OF ANTHONY S. WISEN - 3

Law Offices of Anthony S.
Wisen, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisenlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

DATED this 11th day of June, 2021

/s/ Anthony S. Wisen
Anthony S. Wisen, WSBA #39656

DECLARATION OF ANTHONY S. WISEN - 4

Law Offices of Anthony S.
Wisen, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisenlaw.com